



MEMORANDUM

TO: John Iurino
Zoning Examiner

DATE: April 17, 2019
For May 2, 2019 Hearing

FROM: Scott Clark
Planning & Development Services
Interim Director

SUBJECT: SPECIAL EXCEPTION LAND USE
PLANNING & AND DEVELOPMENT SERVICES REPORT
SE-19-05 AT&T – Randolph Way, R-1 (Ward 6)

Issue – This is a request by Steve Olson of Bechtel, on behalf of AT&T Mobility, for approval of a wireless communication facility (WCF). The special exception site is located approximately 1,200 feet north of 22nd Street and 2,400 feet east of Country Club Road within Reid Park (see Case Location Map). The preliminary development plan (PDP) proposes a wireless communication tower with three antenna panels, and with options for future colocation, concealed within an artificial pine tree (monopine), 125 feet in height. The applicant states that in addition to providing standard AT&T wireless services to the general public, the proposed facility is part of the FirstNet project, which is a contract awarded to AT&T by the federal government. In 2012 Congress created the First Net Authority, which is responsible for building a nationwide public safety broadband wireless network for first responders. The facility will be placed within an approximately 528-square foot (33 feet by 16 feet) lease area located near the park administration buildings, on the north side of Zoo Court, and to the northeast of the parking lot for the Reid Park Zoo. The proposed ground equipment and the monopine will be located within an area screened by a fence with privacy slats. Access is from an existing paved driveway just to the north of Zoo Court.

A communications use of this type in the R-1 zone is subject to Sections 4.9.13.O and 4.9.4.I.2, .3, and .7 of the *Unified Development Code (UDC)* and requires approval through a Mayor & Council Special Exception Procedure, in accordance with *UDC* Sec. 3.4.4, because the tower height exceeds 50 feet in height. Documentation provided by the applicant indicates that no practical alternative exists, and measures are being taken to conceal or disguise the tower and antenna panels from view.

The Mayor & Council Special Exception Procedure requires a public hearing before the Zoning Examiner after which the Zoning Examiner forwards a recommendation to the Mayor and Council for a decision to grant the request with, or without, conditions or to deny the request. The Mayor and Council may also forward the request to the Design Review Board (DRB) for design review and recommendation.

Planning & Development Services Department Recommendation – The Planning & Development Services Department recommends approval of the special exception request, subject to the attached preliminary conditions.

Background Information

Existing Land Use: Paved area within Reid Park, a City of Tucson public park.

Zoning Description:

R-1 (Residential Zone): This zone provides for urban, low density, single-family, residential development, together with schools, parks, and other public services necessary for a satisfactory urban residential environment. Certain other uses, such as day care and urban agriculture, are permitted that provide reasonable compatibility with adjoining residential uses. The minimum required lot size is 7,000 square feet.

Surrounding Zones and Land Uses:

North: Zoned R-1; Reid Park facilities buildings and parking lots

South: Zoned R-1; Reid Park facilities buildings and zoo

East: Zoned R-1; Reid Park facilities buildings and parking lots, Randolph Park Golf Course

West: Zoned R-1; Reid Park facilities buildings, parking lots, and zoo

Previous Cases on the Property: None

Related Cases:

SE-16-61 Verizon – 29th Street, R-1 Zone – This was a request for approval of a wireless communication facility concealed within an artificial pine tree (monopine), 59 feet in height, with associated equipment as a special exception land use in the R-1 zone. The special exception site is located 200 feet south of 29th Street and 50 feet east of Sahuara Avenue. On October 19, 2016, the Mayor and Council adopted Ordinance No. 11404, allowing the special exception.

SE-15-78 Verizon – Craycroft Road, SR Zone – This was a request for approval of a wireless communication facility concealed within an artificial pine tree (monopine), 70 feet in height, and associated equipment as a special exception land use in the SR zone. The special exception site is located 170 feet south of the Rillito River multi-use path and 520 feet west of Craycroft Road. On February 9, 2016, the Mayor and Council adopted Ordinance No. 11338, allowing the special exception.

Applicant's Request – The applicant requests special exception approval for the placement of a 125-foot high cellular communications monopole disguised as a pine tree (monopine) with associated equipment.

Planning Considerations

Land use policy direction for this area is provided by the *Arroyo Chico Area Plan* and *Plan Tucson*. Although no specific policy direction is provided for WCF's in the *Arroyo Chico Area Plan*, a goal is to encourage the compatibility of public uses with surrounding development and to provide for a mix of residential, industrial, and business uses within the *Plan* area, while protecting the integrity of existing neighborhoods. *Plan Tucson* identifies this area in the Future Growth Scenario Map as "Existing Parks/Open Space" and supports new services and amenities that contribute further to neighborhood stability. Policy LT28.1.2 requires that, if possible, wireless communication facilities be located, installed and maintained to minimize visual impacts and preserve views. The proposed wireless communication facility will help improve telecommunication services and emergency response in the area.

The special exception site is currently developed as a City park in the R-1 residential zone. The site is completely surrounded by park facilities, including administration offices and maintenance buildings, parking lots, the zoo, golf course, picnic areas, and other recreational amenities. The park is bordered by major streets, with 22nd Street to the south, Alverson Way to the east, Broadway Boulevard to the north, and Country Club Road to the west. The nearest single-family residentially zoned and developed properties are located approximately 1,300 feet to the south of the site, across 22nd Street.

The applicant received written approval from the City of Tucson's Real Estate Consultant to file the application for zoning approval and will be obtaining a lease agreement with the City. Currently, the City of Tucson maintains two communication monopole towers in the immediate vicinity. One is 125-foot tall and is approximately 130 southeast of the proposed monopine. The other is 175-foot tall and is approximately 230 feet southeast of the proposed monopine.

The Pima Association of Governments - Transportation Planning Division (PAG-TPD) estimates that the proposed development will not generate additional measurable vehicle trips per day. There are currently no billboards on the special exception site.

Design Considerations

Land Use Compatibility – The monopine and ground equipment will be located near park administration facility buildings northeast of the Reid Park Zoo main parking lot, and within a 528-square foot lease area screened by an eight (8) foot tall chain link fence with slats. A backup generator will be housed inside cabinets within the lease area. The applicant has submitted a photo-simulation of the monopine showing the antennas concealed by artificial branches and needles. The monopine will be set back approximately 1,200 feet from 22nd Street to the south, and approximately 200 feet from Randolph Way to the east. A camouflaged stealth monopine design was chosen based on the desire for such a facility as expressed by nearby residents at the neighborhood meeting held on January 16, 2019, and also because of the presence of living pine trees within the park, and to allow for future stealth colocation opportunities.

The monopine will be visible off in the distance from some of the surrounding residential development, as well as from some streets. The proposed stealth monopine provides concealment and reduces the visible impacts to the area. The nearest residences are south of the site in the R-1 residential zone, approximately 1,300 feet from the proposed location of the monopine.

In terms of wireless communication facilities, a stealth application is one that disguises the appearance of the pole and antennas to look like an element of the built or natural landscape, typically observed at the chosen location. A stealth application should be as close as possible in scale and appearance to the object it is disguised as, with no obvious unnatural elements. The success of a stealth application is dependent on the ability of the design and construction of the cellular site to fit into its surroundings to such a degree that it is not noticeable. Scale and proportion, site design, color, and materials, are particularly important in stealth applications insofar as they contribute, or do not contribute, to the ability of the facility to be as unobtrusive as possible. To ensure a successful stealth monopine at this location, the following standards are recommended:

- The monopine shall not exceed 125 feet in height at the highest point;
- The monopine shall include branches and needles;
- The monopine trunk shall be covered with cladding (faux bark) wherever the pole is visible, and the trunk shall be painted to resemble a live pine;
- Replacement of lost/damaged branches and needles to be completed within ten working days of observation and branches and needles shall be colored to match live pines as closely as possible;
- Monopine branches shall start at no more than 15 feet above grade elevation;
- All cables shall be run inside the pole, with no foot pegs other visible appurtenances;
- All wire ports shall be concealed behind the antennas and equipment on the monopine shall be mounted behind the antenna panels;
- Ground equipment to be located within lease area and housed within several cabinets screened by an 8-foot chain link fence with slats;
- Antennas shall be camouflaged with faux pine needle socks to match needle density and color of monopine.

Road Improvements/Vehicular Access/Circulation – No road improvements are proposed with this project. Vehicular access to the wireless communications facility is by way of direct access from a paved drive extending off of Zoo Court, within Reid Park.

Federal Regulations – Because this Special Exception application involves a request for a wireless communication facility, the Zoning Examiner's consideration of the application is impacted by the application of federal laws specific to wireless communications. While federal law does not entirely preempt local decision-making authority based on legitimate zoning

requirements, such as community aesthetics and compliance with stealthing requirements, it does impose the following limitations:

- 1) The decision on the application must occur within the “shot clock” period as provided under federal law, which for this type of application is 150 days. In this case, the application was accepted on February 28, 2019 and the “shot clock” period will expire on July 29, 2019. If a decision is not rendered within the “shot clock” period, the review and consideration process is presumed to be unreasonable and affords the applicant the opportunity to file a lawsuit. If sued, the City would need to prove that it acted “reasonably” when it failed to act within the established “shot clock” period.
- 2) The evaluation of the request cannot include consideration of potential environmental or health effects of radio-frequency (RF) emissions where, as here, the facility will comply with FCC regulations and standard on such emissions.
- 3) The decision on the application cannot unreasonably discriminate among providers of functionally equivalent services. A denial may be deemed to be “unreasonable discrimination” if the facility is designed and situated similarly to other previously approved facilities and is no more intrusive than those previously facilities.
- 4) The decision may not have the effect of prohibiting the provision of wireless services, or of causing a significant gap in the applying provider’s coverage. In this context, the relevant issues are: (1) whether the applicant has shown a significant gap in service coverage; and (2) whether the proposal to fill this gap is the least intrusive means of doing so, or whether there are alternative sites that would fill the gap.
- 5) In the event of a denial, that decision and its reasons must be delivered to the applicant in writing, and must be supported by substantial evidence.

Given these constraints, the Zoning Examiner’s recommendation on this application should focus on whether the applicant has demonstrated a significant coverage gap; whether that gap could be addressed through an installation at an alternative site; and whether the proposed concealment/stealth measures are sufficient to meet the City’s requirements. The Zoning Examiner should also consider how this application compares to other prior applications for similar facilities. In the event of a recommendation for denial, the reasons must be stated so they can be incorporated into a written decision and captured in the meeting minutes.

Use-Specific Standards – The applicant’s proposal requires approval as a Mayor and Council Special Exception and must meet the Use-Specific Standards of *UDC* Sections 4.9.13.O and 4.9.4.I.2, .3, and .7. The Mayor and Council may forward the request to the Design Review Board (DRB) for design review and recommendation. Below is the analysis of the performance criteria.

4.9.4.I.7 The following requires approval as a special exception in accordance with Section 3.4.4, *Mayor and Council Special Exception Procedure*.

a. Wireless communication antennas, provided:

(1) The tower or antennas are not permitted by other provisions of this Section.

The 125-foot top of monopine in the R-1 zone does not conform to other sections of the code because it exceeds 50 feet in height.

(2) New towers require a minimum separation of one mile from any existing tower, regardless of ownership, unless documentation establishes that no practical alternative exists.

The nearest existing wireless communications facilities are monopoles of similar and greater heights located within several hundred feet, but these towers are not suitable for AT&T's wireless network.

(3) All appropriate measures shall be taken to conceal or disguise the tower and antenna from external view.

The facility has been designed as a monopine and the tower and antennas will be disguised within the artificial branches and pine needles.

(4) All appropriate measures shall be taken to reduce the negative proliferation of visible towers and antennae by the collocation of new antennae on existing towers or with the facilities of other providers which are located or planned for development within the proposed service area.

The nearest existing WCF is a 120-foot tall monopole approximately 130 feet southeast of the site. This tower is primarily for 911-emergency communication and is not suitable for AT&T's network. No other nearby vertical features are suitable. The search ring to resolve the coverage gap has a radius of approximately 0.25 miles. The monopine will provide for emergency services communication and will allow options for future collocation of stealth wireless antennas to prevent the proliferation of towers.

(5) Notice shall be provided to all agents designated at least 15 days prior to the date of the public hearing before the Zoning Examiner.

All policies of the Mayor and Council Special Exception Process shall be followed accordingly.

Staff finds the proposal to be in compliance with the UDC Use-Specific Standards.

Conclusion – The proposed stealth tower is in compliance with the performance criteria for a wireless communication facility. The Special Exception request is consistent with the policies and intent of the *Arroyo Chico Area Plan* and *Plan Tucson*, considering the use of a stealth design, in this case a monopine, that will limit the visual impact of the facility and provide possibilities for future colocation of concealed wireless communication antennas. The proposal is designed to blend in with the surroundings and does not conflict with plan policies. Staff acknowledges that the WCF will help improve telecom services in the area, and will be especially helpful for first responders in facilitating communication during emergencies. Approval of the request is appropriate subject to the attached preliminary conditions.

PROCEDURAL

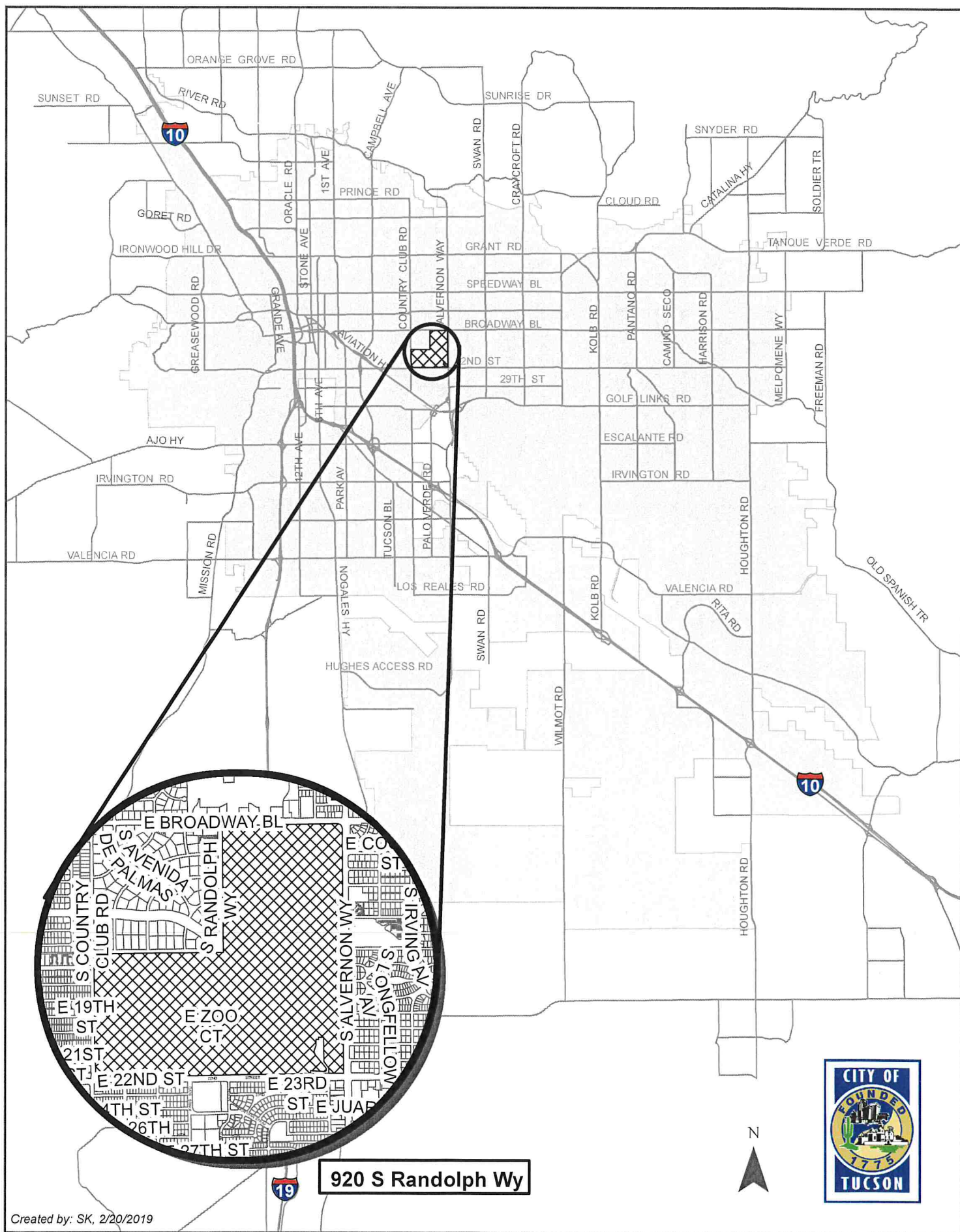
1. A site plan in substantial compliance with the preliminary development plan dated February 19, 2019, is to be submitted and approved in accordance with *Administrative Manual*, Section 2-06.
2. Historic or prehistoric features or artifacts discovered during future ground disturbing activities should be reported to the City of Tucson Archaeologist. Pursuant to A.R.S. 41-865 the discovery of human remains and associated objects found on private lands in Arizona must be reported to the Director of Arizona State Museum.
3. Any relocation, modification, etc., of existing utilities and/or public improvements necessitated by the proposed development shall be at no expense to the public.
4. Five years are allowed from the date of initial authorization to implement and effectuate all Code requirements and conditions of the special exception land use.
5. A copy of the Special Exception decision letter shall be included with the site plan at the time of permit application submittal.
6. According to the FAA Notice Criteria Tool, this project is located in proximity to a navigation facility and could impact navigation signal reception. The applicant shall file Form 7460 with the FAA at <https://oeaaa.faa.gov/oeaaa/external/portal.jsp> at least 45 days before construction activities begin in order to allow sufficient time to respond to any concerns which are identified by the FAA. Any cranes used which are used must also be identified with Form 7460.
7. It shall be the sole obligation of Licensee (AT&T Mobility) to ensure that Licensee does not use the Premises in any way that interferes with the operation, maintenance and repair of equipment and systems as installed and operating at the site, by the City of Tucson, as of the Commencement Date, or with respect to modifications to the AT&T Mobility Communications Equipment as of the date same is installed at the Premises. The operation of the AT&T Communications Equipment shall not interfere with the maintenance or operation of the site, including but not limited to the operation of any radio or telecommunication equipment installed at the site prior to the Commencement Date, or with respect to modifications to the Communications Equipment as of the date same is installed at the Premises ("*Existing Equipment*"). Licensee shall indemnify Licensor and hold Licensor harmless from all expenses, costs, damages, loss, claims or other expenses and liabilities arising from any such interference. Licensee agrees to cease all operations (except for intermittent testing) until the interference has been corrected to the reasonable satisfaction of the Licensor. If such interference has not been corrected within 30 days, Licensor may require Licensee to remove the specific items from the Communications Equipment causing such interference. Prior to or concurrent with the execution of this Agreement, Licensor has provided

or will provide Licensee with a list of radio frequency user(s) and frequencies used on the Premises as of the Effective Date.

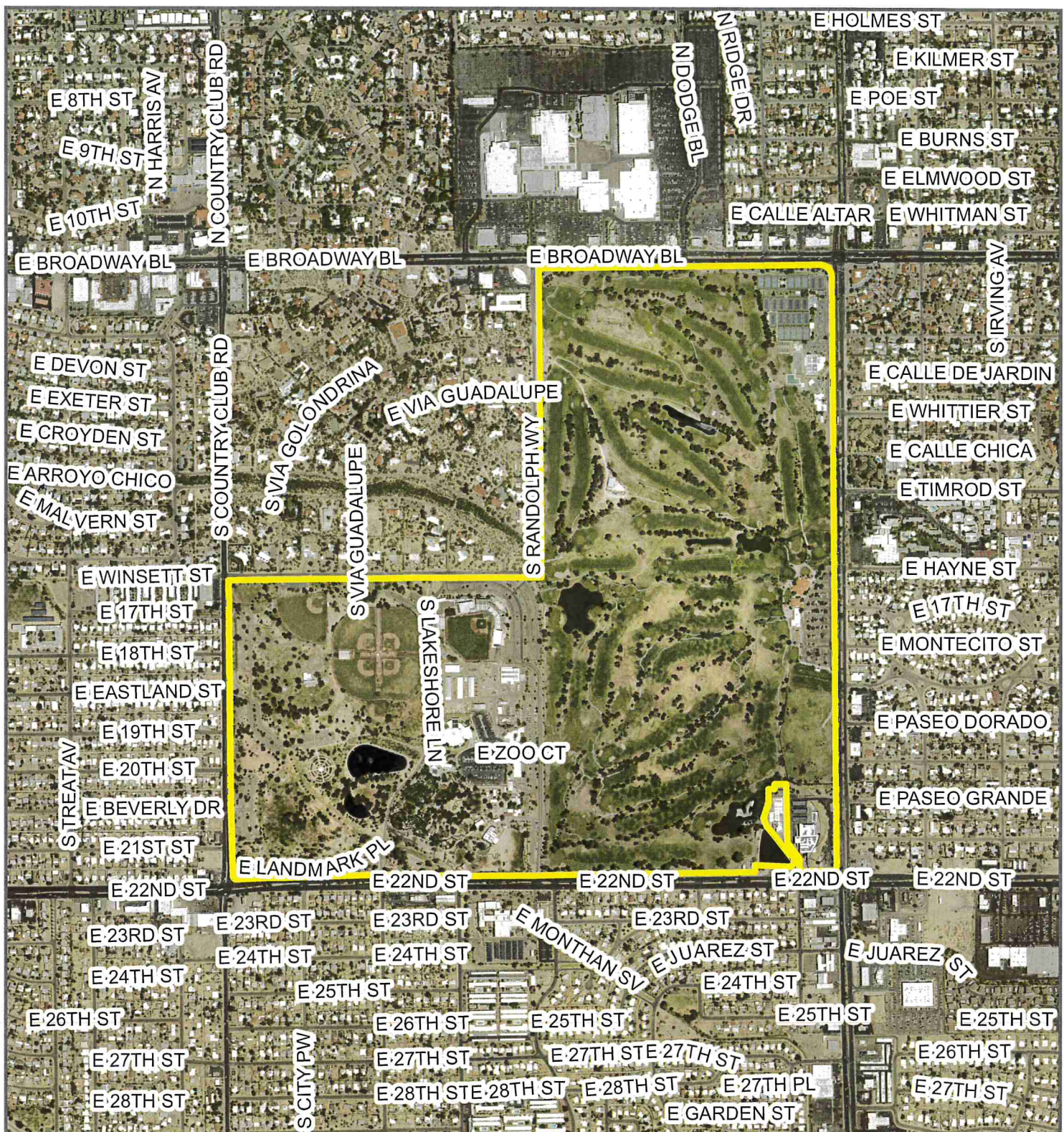
LAND USE COMPATABILITY / CONCEALMENT MEASURES

8. The antennas shall be covered in camouflaged socks to blend with the colors of the artificial branches and needles of the monopine.
9. The pole shall be covered with cladding (faux bark) wherever the pole is visible, and be painted to resemble a live pine tree.
10. Replacement of lost/damaged artificial branches/needles is to be completed within ten (10) working days of observation and artificial branches/needles shall be colored to match live branches/needles as closely as possible.
11. AT&T shall routinely monitor the facility and repair/replace any artificial branches that may become worn or damaged through time.
12. Ground equipment to be located within lease area as depicted on the preliminary development plan dated February 19, 2019.
13. There shall be no exterior wiring, visible footpegs, portals, cabling or cable shrouds, or other unnatural appearing features on the monopine.
14. Plans for future carriers must be approved through the special exception process.

AT and T-Randolph Way



AT and T-Randolph Way



Area of Special Exception Request

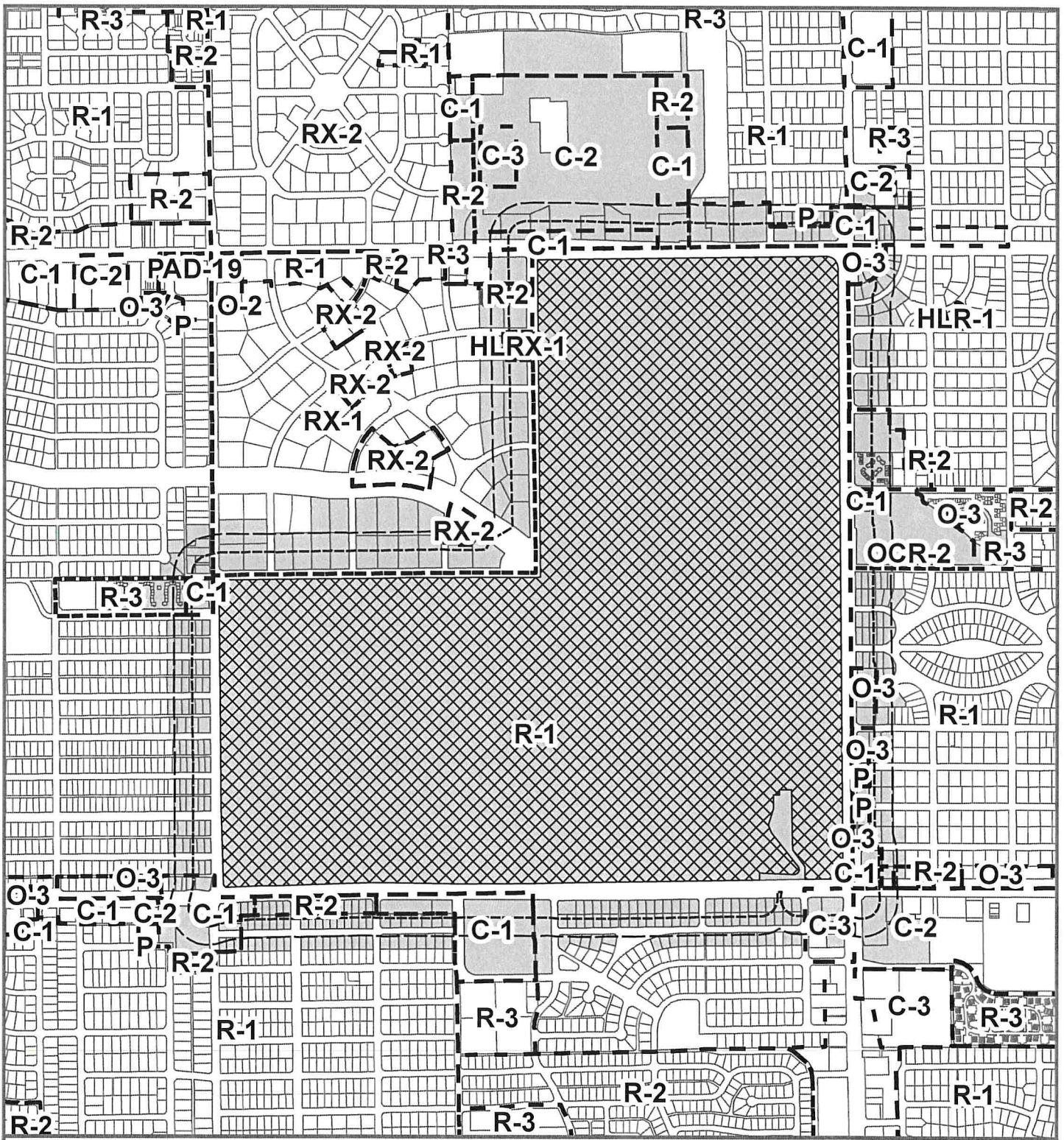


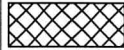




Address: 920 S Randolph Way
Base Maps: Twp.14S Range 14E Sec. 16
Ward: 6



0 590 1,180 Feet
1 inch = 1,166.666667 feet

SE-19-05
AT & T-Randolph Way



-  Subject Property
-  Protest Area (150-foot Radius)
-  Notification Area (300-foot Radius)
-  Zone Boundaries
-  Properties Notified

Address: 920 S Randolph Way
Base Maps: Twp.14S Range 14E Sec. 16
Ward: 6

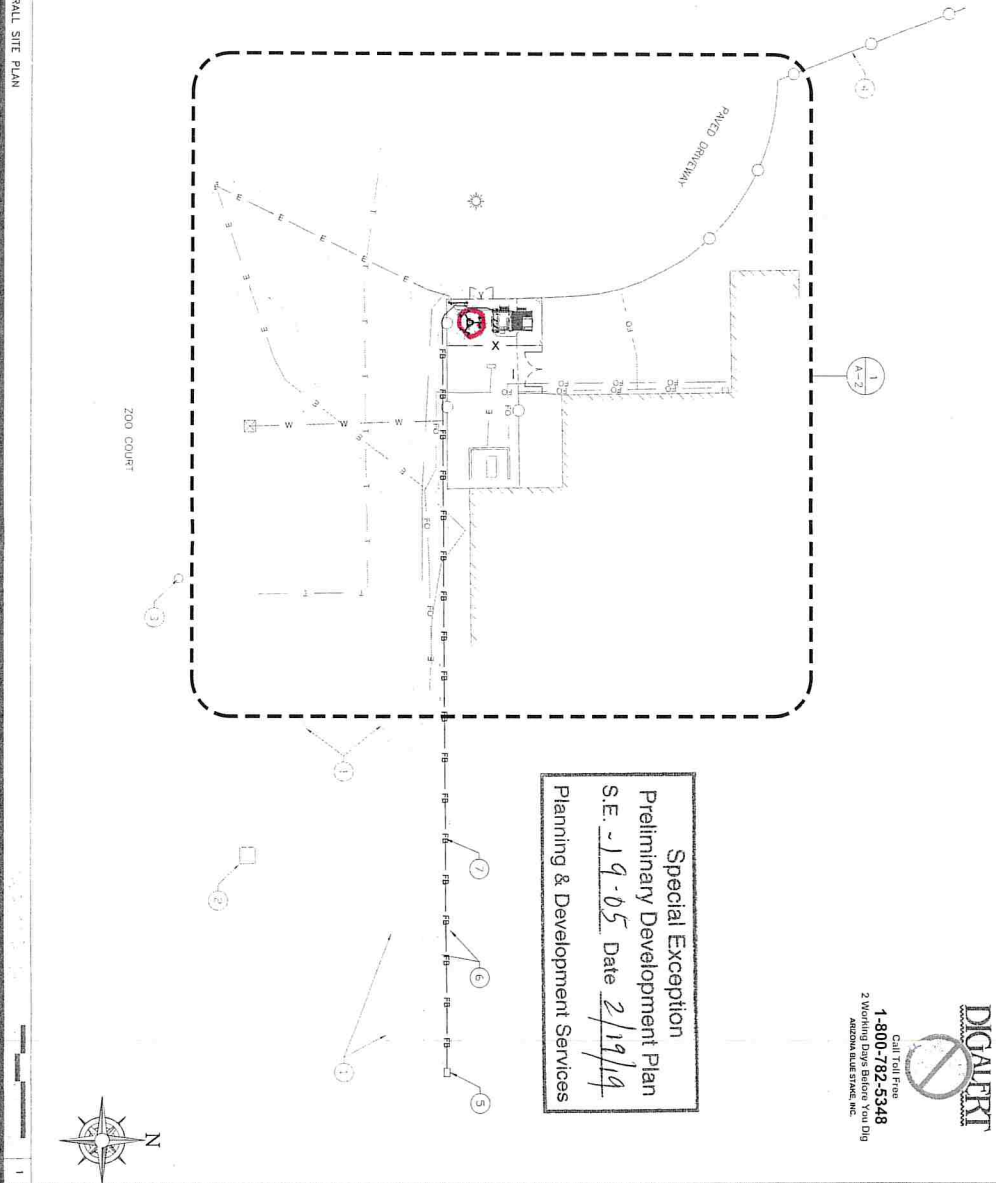
0 590 1,180 Feet
1 inch = 1,167 feet



- OVERALL SITE PLAN KEY NOTES**
1. SITE LOCATED AT CORNER OF ROAD OF PLANNED DEVELOPMENT.
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 7. (E) UTILIZING (E) STAIRS/STAIRS BUT CONDUIT ADJACENT TO UNITS WITH LONGER UNITS.

- NOTES**
1. RETAIL ADDRESS PLACED NEAR ENTRANCE GATE OR COMMON AREA FOR FACILITY STREET OR ASSOCIATED ADDRESS.
 2. ALL LIGHTING IS TO BE INSTALLED TO MEET MIN. 8'-0" (UNLESS REQUIRED OTHERWISE BY APPLICABLE CODES).
 3. ALL LIGHTING SHALL BE THAT OF TYPICAL OFFICE LIGHTING.
 4. ALL LIGHTING SHALL BE THAT OF TYPICAL OFFICE LIGHTING.
 5. ALL LIGHTING SHALL BE THAT OF TYPICAL OFFICE LIGHTING.
- COMPLIANCE**
1. ALL COMPLIANCE FACILITY IS NOT STATED AND NOT NORMALLY OCCURRED.
 2. CONTRACTOR IS RESPONSIBLE FOR EFFECTIVE TEMPORARY FENCING AND/OR FENCING TO PROTECT THE SAFETY OF THE PUBLIC DURING CONSTRUCTION.
 3. THE ANTENNAS SHALL NOT INTERFERE WITH ANY EXISTING COMMUNICATION SITES.
 4. DEVELOPMENT AND USE OF THIS SITE SHALL CONFORM TO ALL APPLICABLE CODES AND ORDINANCES.
 5. ALL NOTES ON THIS DRAWING ARE EXISTING UNLESS OTHERWISE NOTED.
- NOTES**
1. SITE PLAN REVISIONS DURING FIELD VISITS PROVIDED FROM ASSOCIATED MAP & SITE ADJUST.
 2. REFER TO ALL SPECIFICATIONS FOR ADDITIONAL COMMENTS.
 3. C.C. TO VERIFY EXISTING FIELD CONDITIONS AND DIMENSIONS PRIOR TO CONSTRUCTION.
 4. C.C. TO VERIFY ALL EXISTING AND NEW EQUIPMENT INTO COMPLIANCE WITH C.C. TO THE DESIGNER ALL EXISTING AND NEW AT&T CORD TO CORRECT AT&T STANDARDS.

GENERAL SITE NOTES N.T.S. 2 OVERALL SITE PLAN



Special Exception
Preliminary Development Plan
S.E. - 19-05 Date 2/19/19
Planning & Development Services

1-800-782-3348
Call Toll Free
24 Hours a Day
Arizona Wide Service Inc.

LEGEND	SOURCES
01 - NEW	01 - NEW
02 - EXISTING	02 - EXISTING
03 - FUTURE	03 - FUTURE
04 - PUBLIC UTILITY EASEMENT	04 - PUBLIC UTILITY EASEMENT
05 - RIGHT OF WAY	05 - RIGHT OF WAY
06 - BLUE STAKE	06 - BLUE STAKE
07 - FENCE	07 - FENCE
08 - BLUE STAKE	08 - BLUE STAKE
09 - BLUE STAKE	09 - BLUE STAKE
10 - BLUE STAKE	10 - BLUE STAKE
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18 - BLUE STAKE	18 - BLUE STAKE
19 - BLUE STAKE	19 - BLUE STAKE
20 - BLUE STAKE	20 - BLUE STAKE

AT&T
 1555 W. UNIVERSITY DRIVE
 MESA, AZ 85201-5419

BECHTEL INFRASTRUCTURE AND POWER CORPORATION
 1234 E. DESERT FLOWER LANE
 PHOENIX, AZ 85034
 PHONE: (602) 262-1000

APD
 1234 E. DESERT FLOWER LANE
 PHOENIX, AZ 85034
 PHONE: (602) 262-1000

PROJECT: NEW BUILD
SITE NO.: AZ101389
SITE NAME: REID PARK
FA CODE: 14615737
USID: 217567

920 SOUTH RANDOLPH WAY
TUCSON, AZ 85716
PIMA COUNTY

PROFESSIONAL SEAL

01/20/19	CHANGE WORKSHEET	JN	SAW
01/20/19	ISSUED FOR PERMIT	JN	SAW
01/20/19	ISSUED FOR PERMIT	JN	SAW
01/20/19	ISSUED FOR PERMIT	JN	SAW
01/20/19	ISSUED FOR PERMIT	JN	SAW
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01/20/19	ISSUED FOR PERMIT	JN	SAW
01/20/19	ISSUED FOR PERMIT	JN	SAW
01/20/19	ISSUED FOR PERMIT	JN	SAW

SHEET TITLE
OVERALL SITE PLAN

SHEET NUMBER
A-1

ZONING: R-1

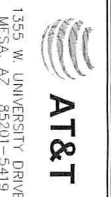


APN: 126-20-001C

ZONING: R-1
AND O-3

Special Exception
Preliminary Development Plan
S.E. -19-05 Date 2/19/19
Planning & Development Services

NOTES
1. THE BOUNDARY SHOWN HEREON IS PLOTTED FROM RECORD INFORMATION. THE USER SHALL BE RESPONSIBLE FOR VERIFYING THE ACCURACY OF THE PROPERTY. THIS MAP IS FOR USE AS ZONING REFERENCE ONLY.



PROJECT: NEW BUILD
SITE NO.: AZLO1389
SITE NAME: REID PARK
FA CODE: 14615737
USID: 217567
920 SOUTH RANDOLPH WAY
TUCSON, ARIZONA 85716
PIMA COUNTY

DATE	REVISION	BY	CHKD
1/29/19	REVISED POLE TYPE	BLN	SAW
11/21/18	APPROVED PER COMMENTS	BLN	SAW
10/11/18	FINAL	BLN	SAW
09/28/18	REVIEW	BLN	SAW
09/25/18	REV. 2D	BLN	SAW



SHEET TITLE
OVERALL PARCEL
FOR ZONING
REFERENCE
SHEET NUMBER
SS-2



Approval – Protest Form

If you wish to submit a written protest or approval, this form is provided for your convenience. Please print your comments below, sign your name, and mail to the Rezoning Section of the Planning & Development Services Department at the address on the reverse side (you will need to attach postage). The number of approvals and protests along with protest calculations will be reported at the Zoning Examiner's public hearing.

Approvals and protests must have an owner's signature to be recorded.

Case **SE-19-05 AT&T – Randolph Way, Ward #6, R-1 Zone** (The proposal is for a 125-foot tall wireless communication tower, concealed an artificial pine tree (monopine) and associated ground equipment, as a special exception land use)

I/We the undersigned property owners, wish to

- ☐ APPROVE the proposed rezoning.
☐ PROTEST the proposed rezoning.

Reason:

PLEASE PRINT YOUR NAME	PLEASE PRINT MAILING ADDRESS	PLEASE PRINT LEGAL PROPERTY DESCRIPTION		
		Subdivision	Block	Lot

Owner's Signature: _____ Date _____

Place
Stamp
Here

City of Tucson
Planning & Development Services
201 N. Stone
P.O. Box 27210
Tucson, Arizona 85726-7210

SE-19-05

Expose this flap - Affix stamp and return



City of Tucson PMc
Planning & Development Services
Rezoning Section
201 N. Stone Avenue
P.O. BOX 27210
Tucson, Arizona 85726-7210

SE-19-05
IMPORTANT SPECIAL EXCEPTION NOTICE ENCLOSED